

Fit/Gap Analysis and Appeals Guidance Frequently Asked Questions



**Grants Management
Line of Business**

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General Background

1. What are the current GMLOB migration milestones?

By the end of Q1 FY08, agencies should complete fit/gap analyses with the existing Consortia and sign a Memorandum of Understanding (MOU) to partner and work towards migration. If the fit/gap analyses demonstrate gaps in an agency's needs, agencies may submit an appeal to OMB. The templates and instructions for completing the fit/gap analyses or submitting an appeal have been issued. By Q2 FY08, all agencies, regardless of their appeals status, must submit an implementation plan.

2. Will there be a second round of Consortium Lead selection?

In August 2007, OMB issued communication to agency Chief Information Officers and Chief Financial Officers stating that there would be no new consortium designations at this time.

3. Does migration occur at the department level or subagency level?

Migration to a consortium can occur at either the department or subagency level.

4. How does an agency fulfill the Q1 FY08 milestone requirements?

Each department or independent agency is required to submit an MOU or complete Appeals package to OMB and the GMLOB co-managing partners.

5. Are agencies able to partner with more than one consortium?

Yes. The flexibility to partner with more than one consortium ensures that agencies and grantees are able to access the most comprehensive and appropriate mix of grants management services possible. Agencies are encouraged to subscribe to any grants management services across the consortia landscape they find beneficial.

Fit/Gap Analysis

6. Is the fit/gap template intended to be used after signing an MOU or to inform the consortium selection process?

The fit/gap templates are tools to assist agencies in assessing their compatibility with the three consortia. It is recommended that agencies complete their fit/gap analyses before signing an MOU with a Consortium Lead. In addition, agencies submitting an appeal to OMB will be required to submit completed fit/gap analyses clearly identifying system gaps.

7. Who should complete the fit/gap?

Potential partner agencies should complete fit/gap analyses of the Consortium Leads. Each potential partner agency is responsible for determining the appropriate individuals within their agency to complete the analysis.

8. Why does an agency have to complete a fit/gap analysis if it plans to appeal?

To be considered for an appeal, an agency must demonstrate that existing consortia cannot meet its grant making needs. Consortium Leads will complete a final close-out assessment of the fit/gap once the appeal is submitted. Submitted appeals packages that do not include fit/gap analyses will be considered incomplete and will be automatically rejected.

9. How can a fit/gap analysis be completed in such a short period of time?

The fit/gap templates are intended to provide a high-level summary of each consortium's capabilities. Agencies should highlight their unique specific requirements during one-on-one meetings with Consortium Leads.

10. What GMLOB PMO tools are available for use by agencies in completing the fit/gap analysis?

The GMLOB PMO has provided potential partner agencies with fit/gap templates for each consortium and instructions for completing the template.

11. Where should agencies direct questions regarding capabilities described in the fit/gap analysis?

Agencies should direct questions to the point of contact for each Consortium Lead.

12. Who are the Consortium Lead points of contact for the fit/gap analysis?

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(202) 690-5842
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13. Does an agency have to complete a fit/gap analysis with all three Consortium Leads?

Agencies should use their discretion to select which Consortium Leads fit/gap templates to complete. If an appealing agency does not complete a fit/gap with all three Consortia, they must explain why.

14. What is the review process for completed fit/gap analyses?

Appealing agencies will need to submit their fit/gap analyses for review with their Appeals package. Consortium Leads will complete a final close-out assessment of the fit/gap once the appeal is submitted.

15. What if an agency is unable to identify a consortia-based solution that fulfills its grants management needs?

In August 2007, the Office of Management and Budget announced it would consider appeals (due by Q1 FY08) from agencies that determine existing consortia cannot meet their grants management needs. Fit/gap analyses are required to accompany any appeal. If an appealing agency does not complete a fit/gap with all three consortia, they must explain why. Submission of an appeal does not guarantee the acceptance of the appeal. As part of their appeal, agencies are required to submit a plan of action if their appeal is not accepted.

Appeals Process

16. What is an appeal?

An appeal is a formal request from a Federal Agency to OMB asking for an exemption from partnering with the existing Consortia. The appeal must state why a consortia-based solution is unable to fulfill the agency's needs and explain the alternative solution they plan to pursue.

17. Who can submit an appeal?

Any agency can submit an appeal. An agency submitting an appeal should:

- Have attempted a fit with a Consortium Leads.
- Confirm that agency mission critical unique functionality could not be maintained if the agency's or a portion of agency's processes were migrated to a Consortium Lead.
- Have a plan in place to meet the Q2 FY08 milestone regardless of appeal outcome.
- Commit to scheduling a meeting with OMB within five days of appeals outcome notification, if their appeal is rejected, in order to discuss next steps.
- Acknowledge that in the event the appeal is granted, OMB will specify the time-span of the exemption.
- Be prepared to annually document benefits aligned with GMLOB goals directly resulting from the alternative solution in the event an appeal is granted.
- Ensure alternative solution will align with the Federal Funding Accountability and Transparency Act, Grants.gov, and other government-wide grants requirements.

18. Should agencies appeal if their current grants management systems still have several years of existing lifecycle?

Agencies who have several years of existing lifecycle remaining should still join a consortium and work towards future migration. As part of the Q2 FY08 milestone, agencies should develop an appropriate timeline for migration to a consortium solution.

19. What is an agency required to submit in its appeal?

In order for an agency's appeal to be eligible for consideration, the agency must submit a completed appeals form. The form contains the following sections:

- User agreements – Agency must agree to all stipulations to be considered for appeals
- Fit/gap analysis results – Agency must provide all completed fit/gap analyses
- Background – Agency must provide background concerning their involvement in the GMLOB process and present factors that make it a good candidate for an appeal
- Alternative solution justification – Agency is required to provide a description of their alternative solution, including:
 - Summary of key benefits achieved through the alternative solution.
 - Justification of how the alternative solution fills requirements gaps identified in the fit/gap analyses.
 - Documentation of the cost savings and/or cost avoidance achieved through the alternative solution.
 - Description of how the alternative solution prepares an agency for process standardization and streamlining.
 - Description of how the alternative solution is consistent with and enhances the goals of GMLOB.
 - Description of how the alternative solution will align with FFATA, Grants.gov, and other government-wide grants requirements.

20. Are there specific criteria that constitute grounds for appeal?

No. There are no criteria that automatically qualify an agency for an appeal.

21. What is the deadline for submitting an appeal?

The deadline for submitting an appeal is Monday, December 31, 2007 at 5:00pm.

22. Where should agencies submit appeals?

Appeals should be submitted to Rebecca Ferguson (Rebecca.ferguson@omb.eop.gov), the GMLOB E-gov Portfolio Manager, with a copy to Mary Santonastasso (msantona@nsf.gov) and Terry Hurst (Terry.Hurst@hhs.gov).

23. What will happen to incomplete appeals?

Incomplete appeals will be automatically rejected.

24. How will appeals decisions be made?

First and foremost, appeal decisions will be reviewed for completeness and accuracy. Incomplete and inaccurate appeals will be automatically rejected. Appeals will then be reviewed, evaluated, and decided upon by OMB.

25. Will my appeal be evaluated against appeals from other agencies?

An agency's appeal information will not be compared to that of other appealing agencies.

26. Will an agency have an opportunity to meet with OMB to discuss its appeal before the decision is made?

There will be no appeal hearings or presentations associated with this process.

27. What is the timeframe for notifying an agency regarding the status of their appeal?

An agency will be notified by OMB in writing of its appeal decision within six weeks of the appeal due date.

28. What happens if an agency's appeal is rejected by OMB?

As part of the appeals package, agencies are required to include a back-up plan for meeting the Q2 FY08 milestone in the event that their appeal is rejected. Agencies whose appeals are rejected are expected to schedule a meeting with OMB within five days of their rejection notification to determine next steps.